



# Oregon

Theodore Kulongoski, Governor

## Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4<sup>th</sup> Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

May 25, 2004

Wayne Wooster  
Environmental Affairs Manager  
Golden Northwest Aluminum, Inc.  
7710 NE Vancouver Mall Dr., Suite G  
Vancouver, WA 98662

RE: No Further Action Determination  
Alumina Unloading Facility  
2600 N. River Street, Portland, OR  
ECSI #2440

Dear Mr. Wooster:

The Oregon Department of Environmental Quality (DEQ) completed a review of the Expanded Preliminary Assessment (XPA) conducted for the above-referenced site. The purpose of this letter is to document DEQ's no further action (NFA) determination at the subject property. The project was conducted under DEQ's Voluntary Cleanup Program in accordance with the letter agreement executed on February 1, 2000.

DEQ determined that no further action is required to address environmental contamination at the subject property. This determination is based on the regulations and facts as we now understand them, including but not limited to the following:

1. The 8-acre facility is located at river mile 10, approximately one-half mile upstream from the southern extent of the Portland Harbor study area, and is surrounded on three sides by the Union Pacific Railroad Albina Yard. The property has been used since 1957 by various companies to transfer alumina from ocean-going ships to railcars. The current facility was constructed in 1982 and the current owners have operated the facility since 1987. Prior to 1957, the northern portion of the property was undeveloped, and grain shipment operations were located on the southern portion of the property from about 1936 to 1966.
2. The facility has an NPDES General Permit 1200Z for three storm water outfalls to the Willamette River. Storm water was sampled twice from the NPDES monitoring point as part of the XPA. Results from January and May 2001 samples showed trace to non-detectable levels of oil/grease and polycyclic aromatic hydrocarbons (PAHs). This data suggests that there does not appear to be a significant current source of petroleum contaminants in storm water that would likely result in contaminant accumulation in adjacent sediment.
3. Two 1,000-gallon underground storage tanks (USTs) located about 100 feet from the Willamette River were removed from the property in 1981; there are no records of these

removals. A 1,000-gallon gasoline UST and a 1,000-gallon diesel UST were installed in 1981 and removed in 1989 with no visual or analytical evidence of leakage to surrounding soil. A shallow groundwater evaluation in the vicinity of the two decommissioned USTs was conducted in December 2002 to evaluate the potential groundwater contamination pathway to the Willamette River. No field evidence of petroleum products were observed in continuous soil cores or groundwater samples. Laboratory analyses did not detect total petroleum hydrocarbons as gasoline, benzene, toluene, ethylbenzene, xylenes (BTEX), or naphthalene in any of the eight groundwater samples.

4. A 1993 Phase I Environmental Site Assessment (ESA), a 1996 Environmental Compliance Review, and a 1998 Phase I ESA and Environmental Compliance Review Update conducted for Goldendale revealed no substantial environmental issues for the subject property.
5. Pre- and post-maintenance dredging sediment samples were collected in June and December 2000, respectively, adjacent to the facility in the Willamette River. Detected levels of PAHs in sediment are likely from off-site sources, including a 1991 spill of 8,000 gallons of bunker C fuel during refueling of a ship docked at the Goldendale facility by a barge (via transfer hose).
6. No remedial actions were conducted at the site.

DEQ concludes that based on the information presented to date, no significant releases of hazardous substances have occurred at the site and the site does not appear to be a current source of contamination to the Willamette River. The site requires no further action under the Oregon Environmental Cleanup Law, ORS 465.200 et seq., unless new or previously undisclosed information becomes available. We will update the Environmental Cleanup Site Information System (ECSI) database to reflect this decision.

The U.S. Environmental Protection Agency's agreement with DEQ's determination that the subject site is not a current source of contamination to the Willamette River is attached.

If you have any questions regarding the site, please contact me at (503) 229-5326.

Sincerely,

Tom Gainer, P.E.  
Project Manager  
Cleanup & Portland Harbor

Attachment

cc: Jim Anderson, DEQ NWR  
Rod Struck, DEQ NWR